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October 16, 2006

**Via ECFS and Courier**

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Ms. Marlene H. Dortch  
 Office of the Secretary  
 Federal Communications Commission  
 c/o Natek, Inc.  
 236 Massachusetts Avenue, N.E.  
 Suite 110  
 Washington, DC 20002

**Re: WC Docket No. 06-184 (via ECFS)**  
**IB Docket No. ITC-T/C-20060929-00450 (via Courier)**  
**SUPPLEMENT to the Application of Citizens Communications Company and**  
**Commonwealth Telephone Enterprises, Inc. and Their Operating**  
**Subsidiaries, for Grant of Authority Pursuant to Section 214 of the**  
**Communications Act of 1934 and Section 63.04 and 63.18 of the**  
**Commission's Rules to Complete a Transfer of Control of Commonwealth**  
**Telephone Enterprises, Inc., a Domestic and International Carrier, to Citizens**  
**Communications Company**

Dear Ms. Dortch:

Citizens Communications Company ("Citizens") and Commonwealth Telephone Enterprises, Inc. ("Commonwealth") (Citizens and Commonwealth together, "Applicants") hereby supplement their Application in order to update and clarify certain information provided in the Application.

1. Operating Status of Citizens Communications Company: Citizens is a holding company for various operating companies, including, among others, the Citizens and Frontier ILEC operating subsidiaries. Citizens' telecommunications operating subsidiaries are described in Exhibit A of the Application. Citizens Communications Company does not itself provide telecommunications services.

2. Description of Adjacent Citizens and Commonwealth Territories: Commonwealth only provides telecommunications services in Pennsylvania, and as such, the Applicants only have adjacent service territories in that state. Please see the map attached hereto as Attachment A, which shows all of the service territories of Citizens and Commonwealth entities (among others) in Pennsylvania.

The following Citizens operating companies operate in Pennsylvania in exchanges adjacent to Commonwealth territories:

**Frontier Communications of Lakewood, LLC**

Pennsylvania Exchanges: Lakewood (Barnesville)  
1 Adjacent Commonwealth Exchange: Ringtown

**Citizens Telecommunications Company of New York, Inc.**

Pennsylvania Exchanges: Little Meadows; Quaker Lake  
5 Adjacent Commonwealth Exchanges: Warren Center; Saint Joseph; Lawsville; Leraysville; Montrose

**Frontier Communications of Canton, LLC**

Pennsylvania Exchanges: Canton; Leroy  
5 Adjacent Commonwealth Exchanges: Troy; Towanda; Estella; Liberty; Blossburg

**Frontier Communications of Pennsylvania, LLC**

Pennsylvania Exchanges: New Holland; Intercourse; Terre Hill; Leola  
1 Adjacent Commonwealth Exchange: Gap

3. Entities Covered by Applicants' Blanket Domestic 214 Authorizations:

Citizens: Blanket Domestic 214 Authority is held by Citizens Communications Company, and covers the following Citizens ILEC subsidiaries:

Citizens Telecommunications Company of California Inc.  
Citizens Telecommunications Company of Idaho  
Citizens Telecommunications Company of Illinois  
Citizens Telecommunications Company of Minnesota, LLC  
Citizens Telecommunications Company of Montana  
Citizens Telecommunications Company of Nebraska  
Citizens Telecommunications Company of Nevada  
Citizens Telecommunications Company of New York, Inc.  
Citizens Telecommunications Company of Oregon  
Citizens Telecommunications Company of Tennessee, L.L.C.  
Citizens Telecommunications Company of the Golden State  
Citizens Telecommunications Company of the Volunteer State, LLC  
Citizens Telecommunications Company of the White Mountains, Inc.  
Citizens Telecommunications Company of Tuolumne  
Citizens Telecommunications Company of Utah  
Citizens Telecommunications Company of West Virginia  
Citizens Utilities Rural Company, Inc.  
Frontier Communications - Midland, Inc.  
Frontier Communications - Prairie, Inc.

Frontier Communications - Schuyler, Inc.  
Frontier Communications - St. Croix LLC  
Frontier Communications of Alabama, LLC  
Frontier Communications of AuSable Valley, Inc.  
Frontier Communications of Breezewood, LLC  
Frontier Communications of Canton, LLC  
Frontier Communications of DePue, Inc.  
Frontier Communications of Fairmount LLC  
Frontier Communications of Georgia LLC  
Frontier Communications of Illinois, Inc.  
Frontier Communications of Indiana, LLC  
Frontier Communications of Iowa, Inc.  
Frontier Communications of Lakeside, Inc.  
Frontier Communications of Lakewood, LLC  
Frontier Communications of Lamar County, LLC  
Frontier Communications of Michigan, Inc.  
Frontier Communications of Minnesota, Inc.  
Frontier Communications of Mississippi, LLC  
Frontier Communications of Mondovi LLC  
Frontier Communications of Mt. Pulaski, Inc.  
Frontier Communications of New York, Inc.  
Frontier Communications of Orion, Inc.  
Frontier Communications of Oswayo River, LLC  
Frontier Communications of Pennsylvania, LLC  
Frontier Communications of Seneca-Gorham, Inc.  
Frontier Communications of Sylvan Lake, Inc.  
Frontier Communications of the South, LLC  
Frontier Communications of Thorntown, LLC.  
Frontier Communications of Viroqua LLC  
Frontier Communications of Wisconsin LLC  
Frontier Telephone of Rochester, Inc.  
Navajo Communications Company, Inc.  
Ogden Telephone Company  
Rhinelander Telephone LLC

In addition to the these ILECs, Citizens' blanket 214 authority also covers Frontier Communications of America, Inc., and Frontier Communications of Rochester, Inc., which operate as CLECs and provide interexchange services (both are directly held by Citizens Communications Company).

Commonwealth: Blanket Domestic 214 Authority is held by Commonwealth Telephone Enterprises, Inc., and includes the following Commonwealth subsidiaries: CTSI, LLC and Commonwealth Long Distance Company, a long distance service provider wholly owned by CTE Telecom, LLC.

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4. Background on Citizens Operating Subsidiaries: All Citizens operating subsidiaries, as set forth in Exhibit A and its Appendices to the Application, were incorporated or otherwise established in the United States. No Citizens operating subsidiary is a foreign company.

5. Background on the Board of Directors of the Stowers Institute for Resource Development, Inc.: As set forth in the Application, the Stowers Institute for Resource Development, Inc. is managed by its Board of Directors managed by the following persons: James E. Stowers III, Richard W. Brown, Robert Peterson, and Allan J. Huber. Each of these directors are U.S. citizens.

6. Clarification of Commonwealth's Investors: Besides the Stowers Institute for Resource Development, Inc. (as detailed in the Application), the following is the only other entity owning a 10% or greater direct *equity* interest in American Century Companies, Inc.<sup>1</sup>:

Name:	JPMAC Holdings, Inc.
Address:	270 Park Avenue New York, NY 10017
Ownership:	43.21% (of American Century Companies, Inc.)
Citizenship:	Delaware
Principal Business:	Investment Holding Company wholly owned by J.P. Morgan Chase & Co. (see below).

*Ownership of JPMAC Holdings, Inc.*

The following entity owns a 100% direct interest in JPMAC Holdings, Inc.:

Name:	JP Morgan Chase & Co.
Address:	270 Park Avenue New York, NY 10017
Ownership:	100% (of JPMAC, Inc.)
Citizenship:	Delaware
Principal Business:	Financial

No other entities own any interest in JPMAC Holdings, Inc.

7. Background on Citizens Utilities Company: On May 18, 2000, the shareholders of Citizens Utilities Company approved a proposal to change the company's name to

<sup>1</sup> As detailed in Application, James E. Stowers, Jr. and Virginia G. Stowers each own a 10% or greater *voting* interest in American Century Companies, Inc.

Citizens Communications Company<sup>2</sup>. This change was made by the company to reflect the company's plan to complete divestment of its non-telecommunications public utilities businesses. This name change was not the result of any acquisition or corporate restructuring.

8. Ownership of Frontier Companies: Citizens directly owns the following operating ILECs, including the listed Frontier operating subsidiaries:

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Citizens Telecommunications Company of California Inc.  
Citizens Telecommunications Company of Idaho  
Citizens Telecommunications Company of Illinois  
Citizens Telecommunications Company of Montana  
Citizens Telecommunications Company of Nebraska  
Citizens Telecommunications Company of Nevada  
Citizens Telecommunications Company of New York, Inc.  
Citizens Telecommunications Company of Oregon  
Citizens Telecommunications Company of the Golden State  
Citizens Telecommunications Company of the White Mountains, Inc.  
Citizens Telecommunications Company of Tuolumne  
Citizens Telecommunications Company of Utah  
Citizens Telecommunications Company of West Virginia  
Citizens Utilities Rural Company, Inc.  
Frontier Communications of AuSable Valley, Inc.  
Frontier Communications of Indiana, LLC  
Frontier Communications of Mississippi, LLC  
Frontier Communications of New York, Inc.  
Frontier Communications of Seneca-Gorham, Inc.  
Frontier Communications of Sylvan Lake, Inc.  
Frontier Communications of Thorntown, LLC.

<sup>2</sup> Citizens notified the Commission of the name change through, among other things, updates in the Commission's relevant databases. For example, Citizens Communications Company, FRN 0003576352, is currently recognized by the Commission as the holding company of the Citizens ILECs under the Commission's ARMIS reporting (CTTC). Further, the Commission previously granted Citizens Communications Company authority for transfer of control of the Frontier ILEC's from Global Crossing on April 16, 2001. Finally, the name change did not affect any Citizens international 214 authorizations, as such authorizations are not directly held by Citizens Communications Company, as reflected in the Application, and such change did not involve a corporate restructuring or transfer of control. To the extent necessary, Citizens hereby requests that the Commission update its records to reflect the name change of Citizens Utilities Company to Citizens Communications Company.

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Frontier Telephone of Rochester, Inc.  
Navajo Communications Company, Inc.  
Ogden Telephone Company

Citizens indirectly owns the following Frontier operating subsidiaries through a 100% direct interest in Frontier Subsidiary Telco LLC, which in turn holds a 100% direct interest in the following entities:

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Frontier Communications - Midland, Inc.  
Frontier Communications - Prairie, Inc.  
Frontier Communications - Schuyler, Inc.  
Frontier Communications - St. Croix LLC  
Frontier Communications of Alabama, LLC  
Frontier Communications of Breezewood, LLC  
Frontier Communications of Canton, LLC  
Frontier Communications of DePue, Inc.  
Frontier Communications of Fairmount LLC  
Frontier Communications of Georgia LLC  
Frontier Communications of Illinois, Inc.  
Frontier Communications of Iowa, Inc.  
Frontier Communications of Lakeside, Inc.  
Frontier Communications of Lakewood, LLC  
Frontier Communications of Lamar County, LLC  
Frontier Communications of Michigan, Inc.  
Frontier Communications of Minnesota, Inc.  
Frontier Communications of Mondovi LLC  
Frontier Communications of Mt. Pulaski, Inc.  
Frontier Communications of Orion, Inc.  
Frontier Communications of Oswayo River, LLC  
Frontier Communications of Pennsylvania, LLC  
Frontier Communications of the South, LLC  
Frontier Communications of Viroqua LLC  
Frontier Communications of Wisconsin LLC

Citizens indirectly owns the following Citizens operating subsidiaries through a 100% direct interest in NEWTEL, LLC, which in turn holds a 100% direct interest in the following entities:

Citizens Telecommunications Company of Minnesota, LLC  
Citizens Telecommunications Company of Tennessee, L.L.C.  
Citizens Telecommunications Company of the Volunteer State, LLC

Citizens indirectly owns the following ILEC operating subsidiary through a 100% direct interest in Rhinelander Telecommunications, LLC, which in turn holds a 100% direct interest in the following entity:

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Rhineland Telephone LLC

9. Background on Frontier Communications of America, Inc.: Frontier Communications of America, Inc. is a CLEC, long distance subsidiary of Citizens Communications Company. Citizens' ILECs, while primarily providing local exchange service, may provide intraLATA toll services as part of their local offerings.

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Except as clarified through this filing, all other information in the above-referenced Application remains accurate. An original and six (6) copies of this letter are enclosed for filing with the International Bureau. A copy of this letter is also being filed in the above-referenced Wireline Competition docket via ECFS. Please date stamp the extra copy and return it in the envelope provided. Should you have any questions regarding this filing, please do not hesitate to contact us at (202) 373-6000.

Respectfully submitted,



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Counsel for Commonwealth Telephone  
Enterprises, Inc.

Attachment

cc: Denise Coca (FCC-Wireline)  
Sumita Mukhoty (FCC-International)

**Attachment A**



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**ASSOCIATION**  
 Harrisburg, Pennsylvania

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